

To. OPhelia Michelle Waters

From. Harry L. Samuel  
Plaintiff

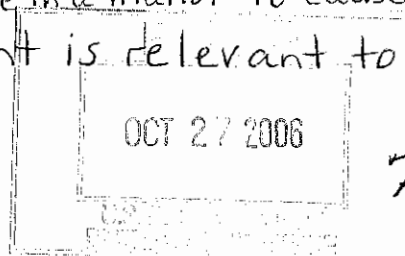
U.S. District Court  
District of Delaware  
Civ. No. 05-037-SLR

Additional Discovery Request

Pursuant to Rule 33 and 34, Fed. R. Civ. P., the Plaintiff submits the following interrogatories and request for documents to the defendants. You are directed to answer each of the interrogatories in writing under oath, and produce each of the requested documents for inspection and copying within 30 days of service.

14. Any and all of the Delaware Correctional Center regulations and Policies on handcuffs Mechanical restraints insofar as Mechanical restraints handcuffs shall never be used in a way that causes undue Physical discomfort, inflicts Physical Pain or in any way restricts the blood circulation or breathing of an inmate. (insofar as the handcuffs pertain to Plaintiff being forced to wear handcuffs in the rear while in the dental chair) Plaintiff force to be handcuff during Dental Treatment by Correctional officer Rob Young on 10-7-04. and 9-7-04 to 11-15-04.
15. State the name, Title and Duty of the Person responsible for the regulations and Policies on Mechanical restraints in the Delaware Correctional Center MHU on 10-7-04 (insofar as the restraints pertain to handcuffs shall never be used in a way that causes undue Physical discomfort, inflicts Physical Pain or in any way restricts the blood circulation). and 9-7-04 to 11-15-04.
16. State the name, Title and Duty of Rob Young Supervisor on 10-7-04, on the 8 to 4 shift that is responsible for Rob Young actions, insofar as they pertain to over seeing Rob Young use of Mechanical restraints handcuffs on Plaintiff in the rear during Dental Treatment. Pertaining to restraint regulations that ensure handcuff are not to be use in a manner to cause undue discomfort or inflict pain. The Discovery sought is relevant to the Claims and Defenses in the case.

Date 10-24-2006



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Harry L. Samuel, Pro Se

Certificate of Service

I, Harry Samuel, hereby certify that I have served a true  
and correct cop(ies) of the attached: Additional Discovery Request  
upon the following

parties/person (s): opposing Counsel

TO: OPhelia M. Waters  
State of Delaware  
Department of Justice  
State office Building  
820 N. French ST.  
Wilmington, Delaware  
19801

TO: \_\_\_\_\_

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TO: \_\_\_\_\_

TO: \_\_\_\_\_

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**BY PLACING SAME IN A SEALED ENVELOPE** and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 25<sup>th</sup> day of October, 2006

Harry Samuel, Pro se

IM Harry Samuel  
SBI# 201360 UNIT 23B,2,U

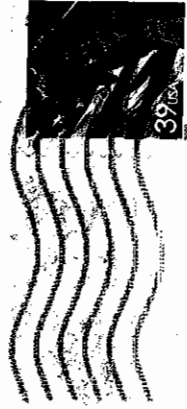
DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON DE 197

26 OCT 2006 PM 1 L



U.S.M.S.  
X-RAY

TO. Office of the Clerk  
United States District Court  
844 N. King Street, Lock box 18  
Wilmington, Delaware  
19801-3570

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